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January 16, 2017

(Via ECF)
The Honorable Malachy E. Mannion
United States District Court
Middle District of Pennsylvania
235 N. Washington Avenue
Scranton, PA 18503

RE: Linda Griffiths v. Metropolitan Life Insurance Company
Docket No.: 3:16-CV-01710
Our File No.: 20548

Dear Judge Mannion:

Attorney Knepper and myself have been attempting to seek resolution in the above referenced matter. However, we have discovered a core issue regarding valuation. Ms. Griffiths has a pending social security decision. The data I have been able to obtain from social security is substantially different than Met Life's offset valuation. We have conducted a short phone conference with the mediator, John R. Lenahan, and are in agreement that due to the difference in valuation, our mediation scheduled for tomorrow would be fruitless. The social security decision will determine the offset valuation. We have agreed to reconvene on January 24, 2017 in order to determine our position.

Additionally, the social security decision regarding disability will likely have a significant impact on the instant matter. It will provide direction on how the Plaintiff's various limitations affect her ability to work. To that end Attorney Knepper and myself are in agreement to request an extension on our dispositive motions deadline of February 15, 2017. Due to a backlog in social security decisions I feel it would be prudent to request an additional 60 days to April 17, 2017 for dispositive motions. Our hope is that some resolution can be reached once additional information becomes available. Thank you for your consideration of our requests.

Respectfully submitted,

Joshua Borer

Joshua Borer

JB/jsp

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